## UNITED STATES DISTRICT COURT DISTRICT OF MAINE

UNITED STATES OF AMERICA,	)
	)
v.	) Case No.: 1:23-cr-00103-LEW
	)
	)
ANGELO CASTIGLIOLA,	)
Defendant.	)

## MOTION TO REOPEN DETENTION HEARING

NOW COMES the Defendant, Angelo Castigliola, and hereby requests that this Honorable Court reopen the detention hearing in this matter, and in support thereof states as follows:

- 1. Mr. Castigliola has been charged with one (1) count of Making Repeated Telephone Calls with Intent to Harass (Class E Felony) and two (2) counts of Transmitting Threatening Interstate Communication (Class D Felony). Mr. Castigliola was arrested on August 14, 2023, and has been in Federal custody ever since.
- 2. During the time frame of the alleged events, Mr. Castigliola was suffering from an extremely significant mental health crisis. As reflected in a forensic evaluation report authored by Dr. Peter Donnelly, Mr. Castigliola has struggled with his mental health for most of his life. This has included several inpatient psychiatric hospitalizations.

- 3. In contrast, when Mr. Castigliola is in compliance with treatment, he thrives. By way of example, Mr. Castigliola had a very successful career in cybersecurity prior to his recent mental health crisis.
- 4. Mr. Castigliola resumed taking medications for his mental health on March 14, 2024. According to Dr. Donnelly's report, medical records from the Somerset County Jail note "medical staff documented that [Mr. Castigliola] was appropriate, regulated, and coherent during his mental health contacts since March of 2024. He has been meeting with a psychiatric nurse practitioner on a regular basis."
- 5. Mr. Castigliola's current mental health status has improved significantly since the time period in which these charges were brought. Accordingly, it is appropriate for this Court to revisit the issue of detention.
- 6. For these reasons, the Defense is requesting that Mr. Castigliola be released from detention, with the requirement to abide by any conditions this Honorable Court deems appropriate. This would include conditions to continue any mental health counseling and take all mediations as prescribed.
- 7. The Government does not object to a hearing on this matter being scheduled but may object to release at the hearing.

WHEREFORE, the Defense respectfully requests this Court reopen the detention hearing and order any further relief it deems just and proper.

Respectfully submitted,

Dated: June 28, 2024 /s/ Scott Hess

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## UNITED STATES DISTRICT COURT DISTRICT OF MAINE

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 28, 2024, I filed the foregoing Unopposed Motion to Reopen Detention Hearing using the Court's CM/ECF system, which will cause a copy of the Motion to be sent to all counsel of record.

/s/ Scott Hess

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